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Attorney for Plaintiff  
NACA LOGISTICS (USA), INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

NACA LOGISTICS (USA), INC., a corporation,  
d/b/a DIRECT CONTAINER LINE,

Plaintiff,

v.

GLOBAL RESOURCE UNLIMITED, LLC, a  
limited liability company, and FREIGHT  
SYSTEMS, INC. a corporation,

Defendants.

No. C 06-7266 MJJ

**STIPULATED REQUEST FOR  
ORDER GRANTING RELIEF FROM  
CASE MANAGEMENT SCHEDULE**

Pursuant to Civil Local Rules 6-1(b), 6-2(a), 7-11, and 16-2(d) and (e), plaintiff NACA Logistics (USA), Inc. ("NACA") and defendants Global Resource Unlimited, LLC and Freight Systems, Inc. (collectively "Defendants") request an order granting relief from the Case Management Schedule in the above-captioned matter. The parties request a sixty (60) day continuance to allow entry into and finalization of settlement discussions, currently well in progress.

No previous time modifications to the Case Management Schedule have been requested or granted. The requested enlargement of time/ relief from the Case Management Schedule is sought because NACA and Defendants are currently engaged in settlement discussions. NACA

1 and Global Resource Unlimited, LLC have agreed on a compromise settlement figure and are  
 2 finalizing a settlement agreement. NACA and Freight Systems, Inc. are in settlement discussions  
 3 and anticipate amicably resolving the action between them within the next seven to ten days.

4 IT IS HEREBY STIPULATED by and among plaintiff NACA Logistics (USA), Inc. and  
 5 defendants Global Resource Unlimited, LLC and Freight Systems, Inc. that they request this  
 6 Court order that the Case Management Schedule shall be vacated and amended to reflect the  
 7 following dates:

Date	Event	Governing Rule
4/03/2007	Last day to file ADR Certification with Stipulation to ADR process or Notice of Need for ADR Phone Conference	Civil L.R. 16-8(b) & (c) ADR L.R. 3-5(b) & (c)
4/17/2007	Last day to complete initial disclosures or state objection in Rule 26(f) Report, file/serve Case Management Statement, and file/serve Rule 26(f) Report	FRCP 26(a)(1) Civil L.R. 16-9
4/24/2007	Case Management Conference in Courtroom 11, 19 <sup>th</sup> Floor, SF at 2:00 p.m.	Civil L.R. 16-10

14 DATED: February 15, 2007

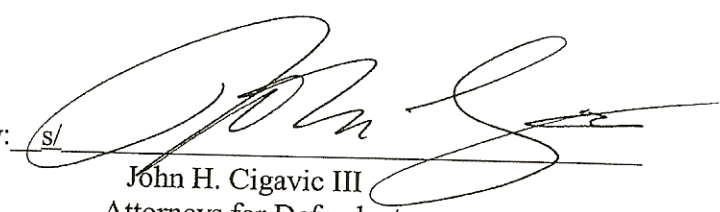
LUCAS VALLEY LAW

17 By: s/ 

18 Mark K. de Langis  
 19 Attorneys for Plaintiff  
 20 NACA LOGISTICS (USA), INC. d/b/a/  
 DIRECT CONTAINER LINE

21 DATED: February 15, 2007

LAW OFFICES OF GEORGE W. NOWELL

24 By: s/ 

25 John H. Cigavic III  
 26 Attorneys for Defendant  
 GLOBAL RESOURCE UNLIMITED, INC.

STIPULATED REQUEST FOR RELIEF FROM CASE MANAGEMENT SCHEDULE (C 06-7266 MJJ)

1 DATED: February 15, 2007

COUNTRYMAN & McDANIEL

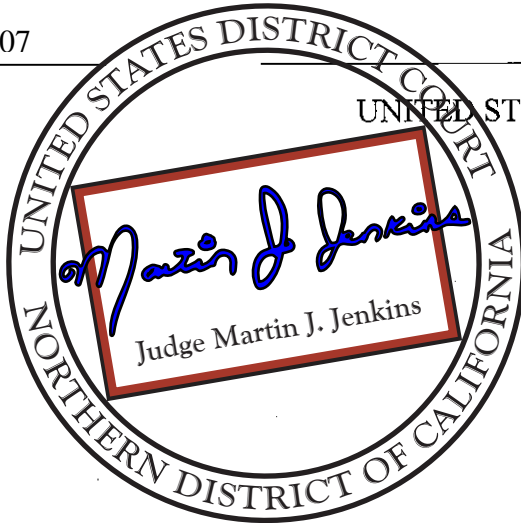
2  
3  
4 By: s/

5 Andrew D. Kehagiaras  
6 Attorneys for Defendant  
7 FREIGHT SYSTEMS, INC.

8 PURSUANT TO STIPULATION, IT IS SO ORDERED

9  
10 Dated: 02/20/07

11 UNITED STATES DISTRICT JUDGE



PROOF OF SERVICE

I am a citizen of the United States, over 18 years of age, not a party to this action and employed in the County of Marin, California, at 2110 Elderberry Lane, San Rafael, California 94903. I am readily familiar with the practice of this office for collection and processing of correspondence for mailing with the United States Postal Service and correspondence is deposited with the United States Postal Service that same day in the ordinary course of business.

Today I served the attached:

**STIPULATED REQUEST FOR ORDER GRANTING  
RELIEF FROM CASE MANAGEMENT SCHEDULE**

**DECLARATION OF MARK K. de LANGIS IN SUPPORT  
OF STIPULATED REQUEST FOR ORDER GRANTING  
RELIEF FROM CASE MANAGEMENT SCHEDULE**

by causing a true and correct copies of the above to be placed in the United States Mail at San Rafael, California in sealed envelope(s) with postage prepaid, addressed as follows:

John H. Cigavic III, Esq.  
Law Offices of George W. Nowell  
120 Montgomery St., #1990  
S.F., CA 94104  
(Attorney for Global Resource)

Andrew D. Kehagiaras  
Countryman & McDaniel  
5933 W. Century Blvd., #1111  
L.A., CA 90045  
(Attorney for Freight Systems)

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on February 16, 2007.

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s/ Mark K. de Langis